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March 4, 2025

VIA ECF

Honorable Carol Bagley Amon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York. 11201

Re: United States v Alain Bibliowicz, 25-cr-00039 (CBA)

Dear Judge Amon:

We write to the Court to request to modify the Bond Order to correctly reflect the bond package presented by the defense with no objection from the government.

On Friday, February 27th, at Mr. Bibliowicz's detention hearing, this Court, in setting the current bond order, increased the size of the bond package to the bond package originally offered by the defense in Miami on February 24th.

That bond package consisted of a \$10 million bond secured by five co-signers and the homes of the defendant, Mr. Bibliowicz, and Mr. Dov Szapiro. The other proposed sureties were Mr. Bibliowicz's mother Jenny, his son Elie, Ian Michael Farkas and Uri Szapiro.

It has come to our attention that the supplement to the bond requires all sureties to post their homes. After conferring with the government, and with their consent, we respectfully request the Court to correct the supplement to the bond order to reflect that the bond be secured by the homes of Mr. Bibliowicz and Dov Szapiro.

The practical effect of this order is only to provide the relief to one surety, Uri Szapiro, who had never intended to post his home and whom the defense never represented to the Court that he would. The other sureties do not own their homes and were not implicated by the order.

Respectfully submitted,

/s/

Anthony M. Capozzolo
Counsel for Defendant, Mr. Bibliowicz

Cc: Counsel of record (via ECF)